



Order Filed on May 12, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

GILLMAN CAPONE, LLC
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Attorney for Debtors- In-Possession
MARC C. CAPONE MC4795

In Re:

Jean-Paul and Lisa A. Romes

Case No.: **24-16283**

Judge: **John K. Sherwood**

Chapter: **11**

**CONSENT ORDER RESOLVING OBJECTION TO DISCLOSURE STATEMENT AND
PLAN FILED BY WATERVIEW MARKETPLACE OWNER LLC**

The relief set forth on the following page, numbered two (2) through three (3), is hereby granted.

DATED: May 12, 2025

A handwritten signature of John K. Sherwood in black ink, written over a horizontal line.

Honorable John K. Sherwood
United States Bankruptcy Court

WHEREAS, on June 21, 2024, Jean-Paul and Lisa Romes (the “Debtors”) filed a voluntary petition for relief under Chapter 11, Subchapter V of the United States Bankruptcy Code; and

WHEREAS, Waterview Marketplace Owner LLC (the “Creditor”) filed a timely proof of claim in the case, which was not objected to or disputed by the Debtors; and

WHEREAS, the Creditor filed an Objection to Disclosure Statement and Plan filed by the Debtors’ [Docket No. 37]; and

WHEREAS, the parties have conferred and desire to resolve the Objection by stipulation and consent, without the need for further litigation; and

WHEREAS, the Debtors have filed an Amended Disclosure Statement and Plan of Reorganization [Docket No. 56] and Modified Chapter 11 Plan in support [Docket No. 59], which reflects the agreed-upon changes, including:

1. Increasing the monthly Plan payments to \$9,500.00 beginning in month 19 and continuing through month 60;
2. Increasing the dividend payable to the Class of General Unsecured Creditors by an aggregate amount of \$31,000.00;
3. Revising the total amount of allowed general unsecured claims in accordance with the proofs of claim filed and deemed allowed under 11 U.S.C. § 502(a), which reduces the overall distribution base; and
4. Agreeing that the Debtors will not object to or seek to modify the proof of claim filed by the Objecting Creditor (Claim No. 22), which shall remain allowed in full as filed.

NOW, THEREFORE, it is hereby **STIPULATED AND AGREED** by and between the undersigned parties and **ORDERED** by this Court that:

1. The Debtors shall increase monthly payments under the Plan to \$9,500.00 beginning in month 19 through month 60, which will result in an increased dividend to general unsecured creditors totaling \$31,000.00.
2. The Debtors shall not object to the proof of claim filed by Waterview Marketplace Owner LLC (Claim No. 22), which shall be deemed allowed as filed.
3. Waterview Marketplace Owner LLC's Objection to Disclosure Statement and Plan [Docket No. 37] shall be deemed withdrawn upon entry of this Consent Order.
4. The terms of this Consent Order shall be incorporated into the Debtors' confirmed Plan of Reorganization by reference.

The parties, through the undersigned counsel, consent to the form and entry of this Order:

GILLMAN CAPONE, LLC
Attorneys for Debtor

TRAURIG LAW LLC
Attorney for Waterview Marketplace Owner
LLC

By: /s/ Marc C. Capone
Marc C. Capone, Esq.

By: /s/ Jeffrey Traurig
Jeffrey Traurig, Esq.

Dated: May 9, 2025

Dated: May 9, 2025